

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,)
)
Plaintiff,) (18 U.S.C. § 2252(a)(4)(B))
) (18 U.S.C. § 2252(b)(2))
v.) (18 U.S.C. § 2253)
)
SHANE ALLEN WERLEIN,)
)
Defendant.)

INDICTMENT

CR-10-59 DWF/FLN

THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1

(Possession of Child Pornography)

On or about March 4, 2009, in the State and District of Minnesota, the defendant,

SHANE ALLEN WERLEIN,

did knowingly possess in interstate commerce, a visual depiction that had been mailed, shipped and transported in interstate and foreign commerce, and which was produced using materials that were shipped and transported in interstate and foreign commerce, by a means, including a computer, the production of such visual depiction having involved the use of a minor engaging in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256, and such depiction being of such conduct, including but not limited to the following computer files:

- (1) (Hussyfan)(pthc)(r@gold)(babyshivid) New & Good Al 4Ypri.mpg;
- (2) PTHC - 8yo Tara, Masturbation, Real Ass Fuck And Rape With Orgasms.mpg;

United States v. Shane Allen Werlein

- (3) Vicky beginning _____ Pedo Child Porno.mpg;
- (4) (Hussyfan) (pthc) (r@ygold) (babyshivid) Babyj teddy.mpg;
- (5) pthc_ptsc 9yo jenny shotrgrub09@yahoo.avi;
- (6) BabyJ-Fuck me !or-rub it in ! 2:20 (pthc kiddy pedo).wmv; and
- (7) part (pthc) Lolita Mary 12yo(Belize).mpg;

all in violation of Title 18, United States Code, Sections 2252(a)(4)(B) and 2252(b)(2).

FORFEITURE ALLEGATIONS

Count 1 of this Indictment is hereby realleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 2253(a).

As a result of the foregoing offense, the defendant,

SHANE ALLEN WERLEIN,

shall forfeit to the United States pursuant to Title 18, United States Code, Section 2253(a), all his right, title and interest in:

- (1) any visual depiction described in section 2251, 2251A, 2252, 2252A, 2252B, or 2260 of this chapter, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of this chapter;

United States v. Shane Allen Werlein

(2) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and

(3) any property, real or personal, used or intended to be used to commit or to promote the commission of such offenses or any property traceable to such property, including a Compaq Presario Computer, serial number PP150AAL and several CDs seized by law enforcement on March 4, 2009.

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b).

All in violation of Title 18, United States Code, Sections 2252(a)(4)(B), 2252(b)(2) and 2253(a).

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON